

Privacy Policy



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1. Purpose of Policy

At The Union Life Mutual Assurance Company (hereinafter “UV Insurance”), we are committed to protecting the privacy of our clients, employees and agents, and to ensuring the protection and the confidentiality of the personal information provided to us in the course of our business.

Our Privacy Policy not only meets the requirements of the *Act respecting the protection of personal information in the private sector*¹ and the *Personal Information Protection and Electronic Documents Act*², but also describes our standards for collecting, handling, using, disclosing, retaining and destroying your personal information. This Policy also explains how we safeguard your personal information and how you can exercise your rights to access and correct that information.

This document is updated at any time and on an ongoing basis to ensure that you are aware of changes to our privacy practices, and to unify these practices and comply with the applicable legislation. We encourage you to review this policy regularly for updates on how we handle your personal information.

By providing us with personal information (via our website at www.uvassurance.ca, our digital interfaces including portals as well as any transactional platform, by email, in person or by telephone), you agree that this personal information will be handled in accordance with this policy, and you authorize UV Insurance and its agents, suppliers or business partners to handle your personal information for the purposes set out below.

2. Scope

Drawing on industry best practices, UV Insurance – including its subsidiaries – affirms its commitment to comply with the laws and regulations governing privacy and to protect all confidential information in its possession. All UV Insurance employees and its subsidiaries who collect, use or disclose personal information are required to adhere to this Policy.

UV Insurance’s responsibility for privacy also extends to its agents, service providers and partners with whom UV Insurance may share personal information necessary for carrying out a mandate or performing a contract of enterprise or for services.

Agents, service providers and partners must offer the same high level of protection to your personal information. UV Insurance limits the personal information it provides to these third parties to information that is reasonably necessary to enable them to perform their duties. Mandates and written contracts with such third parties require them to take reasonable and lawful measures to ensure the confidentiality of such information.

¹ *Act respecting the protection of personal information in the private sector*, CQLR, c. P-39.1.
² *Personal Information Protection and Electronic Documents Act*, R.S.C. 1985, c. P-21.

3. Personal Information

Personal information is information about an individual that, directly or indirectly, identifies him or her. This information is confidential, meaning that it cannot be disclosed to third parties without the consent of the person concerned, except as expressly required by law.

Personal information must be protected whether the enterprise keeps the information itself or through the agency of a third person, and regardless of its characteristics or its form, whether written, graphic, audio, visual, computerized or otherwise.

4. Purpose of Information Collected

UV Insurance collects information about you in order for us to provide you with the high quality services you have requested from us, and also to:

- Confirm your identity;
- Evaluate your request and your eligibility to our products and services;
- Estimate insurance risks;
- Process your claims;
- Meet legal requirements, prevent fraud or resolve issues regarding our relationship;
- Know your opinion regarding our products and services;
- Provide you with personalized offers and advice on our products or services (see your right to withdraw consent) according to your preferences, and in compliance with the rules governing electronic and telephone communications; and
- Conduct studies and researches, including the design and application of statistical models, some of which might enable us to create or infer new information about you.

The nature and sensitivity of the information we collect about you vary depending on the services we provide and the legal requirements with which we must comply.

Here are some examples of personal information that we may collect in the course of our service delivery and activities:

- Name, address, email and phone number;
- Age, gender, marital status, family status;
- Identification numbers such as your driver's licence number or social insurance number;
- Your insurance coverage, transactions and service usage history;
- Financial information, such as your place of employment, sources of income, credit history, assets and liabilities; and
- Medical information, if required for some of our insurance products.

The purposes for which we collect your personal information are identified before or at the time of collection.

Customer service calls may be monitored and recorded for accuracy, training or quality of service purposes.

5. Methods Used to Collect Your Personal Information

We collect your personal information in several ways:

- Through your financial security advisor who collects it on our behalf;
- Directly, in the course of delivering the products or services we provide to you;
- Through our forms on our website (www.uvinsurance.ca) and our digital interfaces, as well as :
 - Through requests that you submit (claims and benefits) on your insurance;
 - Through statements (administrative forms); and
 - Through applications for insurance products (questionnaires).

6. Consent

When we collect personal information about you in accordance with this policy, we obtain your clear, free and informed consent to use it for the purposes for which it was collected.

UV Insurance requires your consent to use your information for any other purposes, to share it with third parties other than those prescribed by law or to collect additional information about you.

This consent may be obtained in writing, verbally, electronically or through an authorized representative, such as your financial security advisor. If you do not consent to the collection, use and sharing of your personal information, we may not be able to provide you with the products and services you have requested, or the administration of your file may be compromised.

Consent must be given by you or your authorized representative such as a legal guardian or a person having power of attorney. You may withdraw your consent to the disclosure and/or use of your personal information at any time, subject to legal or contractual restrictions. We will inform you of the consequences of withdrawing consent, including the possibility that we may be unable to provide a product or to process your request.

7. Limits to Collection, Use and Disclosure

We limit the collection of your personal information to what is necessary for the purposes explained to you. We collect personal information directly from you, unless you allow us to collect this information from a third party or we have legal authority to do so.

We limit the use of your personal information to the purposes for which it was collected. This means that we cannot use your personal information for any other purpose without your consent, except as required by law.

When necessary, and only with your consent or where permitted by law, we may disclose your personal information to certain authorized third parties, some of whom may be located outside Quebec and Canada, for the proper management of your contract or to meet regulatory and/or legal requirements.

A third party is an external person who is not a party to the relationship between you and UV Insurance. These third parties may include :

- The MIB (a non-profit organization that exchanges information on behalf of its member companies);
- Your insurance representative and his or her employees and any agency with which we do business and who have the right to supervise, directly or indirectly, your advisor and his or her employees;
- Other financial institutions, such as yours, insurers and reinsurers;
- Any person or organization to whom you give your consent;
- Any doctor, healthcare professional or other practitioner;
- Any hospital, laboratory, medical clinic or paramedical organization;
- Personal information agents;
- Your employer or former employer;
- Ministries, government agencies, or regulatory authorities;
- Service providers and agents who need the information to fulfill their contract or mandate and ensure the proper administration of our products;
- Legal or judicial authorities, where required by law, for example in the case of fraud or criminal activity; and
- Any person legally authorized.

Notwithstanding the foregoing, your personal information is accessible only to authorized persons, and only to the extent necessary to perform their duties.

You have the right to know the names of the third parties to whom your information was disclosed for the purposes stated. We will refuse to disclose this information only in exceptional circumstances and in accordance with the law.

We may, under certain circumstances, use service providers outside Quebec. We have a responsibility to ensure that the personal information shared will be properly protected, particularly with regard to generally accepted privacy principles.

8. Retention

We retain your personal information as long as needed for the purpose for which it was collected and for all authorized secondary uses.

After this purpose has been achieved, we will stop using your personal information and will destroy it.

Once personal information has been used to make a decision about you, it will be retained for a minimum of one year from the service or product end date.

We may de-identify personal information for a secondary use authorized by law. This process removes the link between the information and your identity to protect it once the purposes for which the information was retained have been achieved.

9. Accuracy and Accountability

We make every possible effort to ensure that your personal information is accurate and up to date at the time that it is collected, used or disclosed.

We rely on our clients who use our services and products to provide us with accurate information and to inform us when updates to this personal information are required.

We adhere to legislated and self-imposed rules, aimed to safeguard your privacy. These rules are set out in this Privacy Policy as well as insurance industry guidelines and other applicable legislation. Our staff is informed and adequately trained on our privacy policies and practices.

10. Security Safeguards

We recognize that information security is an integral part of the confidentiality of personal information.

We have implemented and continue to develop rigorous safeguards to ensure that your personal information remains strictly confidential and is protected against loss or theft and from unauthorized access, disclosure, copying, use or modification.

These safeguards include:

- Organizational measures (e.g. use of security clearances, limiting access to a “need-to-know” basis, a cybersecurity department, policies, guidelines and compliance training);
- Physical measures (e.g. electronically managed access to offices for employees, off-site back-ups and archiving, etc.);
- Technological measures (e.g. use of passwords and encryption, frequent password changes, use of firewalls and segmented operator access, etc.).

All UV Insurance members and third-party service providers that we may retain and who process personal information on our behalf are also contractually obligated to maintain the confidentiality of personal information.

11. Your Rights with Regard to Your Personal Information

In accordance with applicable privacy laws, individuals have the following rights:

- **Right of access:** the right to be informed of the existence of processing of their personal information and the right to obtain communication of their personal information;
- **Right of correction:** the right to request correction of any incomplete, inaccurate or ambiguous personal information that we hold;
- **Right of withdrawal of consent:** the right to withdraw consent to the disclosure or use of the personal information collected;
- **Right to information:** the right to be informed of a decision based exclusively on automated processing that uses personal information;
- **Right to information:** the right to be informed in advance of the use of technology allowing the person to be identified, located or profiled and of the means available to activate the functions allowing the person to be identified, located or profiled.
- **Right to portability:** the right to access computerized personal information in a structured, commonly used technological format;

*N.B. This right will not come into force until September 2024

Any request for access or correction is addressed to the UV Insurance Privacy Officer identified below (see section 13 "Transparency, Concerns and Complaints").

The Privacy Officer will respond to the request for access or correction in writing, with due diligence and no later than thirty (30) days from the date of receipt of the request.

Any refusal by UV Insurance to grant a request will be explained to you in writing and will indicate the provision of the law on which our refusal is based, the recourse available to you and the time limit within which your recourse may be exercised. UV Assurance will also provide assistance to help you understand the denial.

12. Limitation of Liability

The use of technologies such as the Internet carries substantial risk, making it impossible to guarantee that the personal information you provide is completely secure. However, rest assured that UV Insurance uses all reasonable means at its disposal to protect your data.

You therefore acknowledge that UV Insurance and its suppliers cannot be held liable for any damages or harm that may arise or result, directly or indirectly, from a privacy breach in relation to the data and/or information sent via the Internet to UV Insurance.

Please be advised that the use of e-mail as a means of communication in order to transmit a document or a text does not guarantee the protection or confidentiality of the information contained in the e-mail.

13. Transparency, Concerns and Complaints

If you have any questions or concerns about this Privacy Policy or how we handle your personal information, or if you would like to exercise your rights or make a complaint, please contact our Privacy Officer by email and mail at:

Privacy Officer

privacy@uvinsurance.ca

1990 Jean-Berchmans-Michaud St.

Drummondville (Quebec) J2C 7G7

Telephone: (819) 478-1315

Toll-free: 1-800-567-0988

Fax: (819) 474-1990

If you contact us to exercise any of the above rights in Section 11, we will respond to your request free of charge within a reasonable time.

